

EXHIBIT 6

In the Matter Of:

USA v

GOOGLE

RAHUL SRINIVASAN

August 29, 2023



1
2 UNITED STATES DISTRICT COURT
3 FOR THE EASTERN DISTRICT OF VIRGINIA
4 -----X
5 UNITED STATES OF AMERICA, et al.,

6 PLAINTIFF,

7 -against-

8 GOOGLE LLC,

9 DEFENDANT.

10 Civil 1:23-cv-00108

11 -----X

12 UNITED STATES DISTRICT COURT
13 SOUTHERN DISTRICT OF NEW YORK

14 -----X

15 In Re Google Digital Advertising Antitrust
16 Litigation

17 1:21-MD-3010 (S.D.N.Y.)

18 -----X

19 ***CONFIDENTIAL***

20
21 DEPOSITION OF RAHUL SRINIVASAN

22 New York, New York

23 Tuesday, August 29, 2023

24 Reported by:

25 Rebecca Schaumloffel, RPR, CLR

JOB #: 2023-909129

Time: 9:05 a.m. Eastern

<p>1 2 APPEARANCES: 3 4 U.S. DEPARTMENT OF JUSTICE 5 Antitrust Division 6 950 Pennsylvania Avenue 7 Washington, DC 20530 8 BY: MICHAEL WOLIN, ESQ. 9 MICHAEL FREEMAN, ESQ. 10 11 AXINN, VELTROP & HARKRIDER, LLP 12 Attorneys for Google 13 1901 L Street NW 14 Washington, DC 20036 15 BY: DANIEL VITTEL, ESQ. 16 SAM SHERMAN, ESQ. 17 18 ALSO PRESENT: 19 20 Steve Sparling, Esq., in-house, 21 Google 22 Lem Lattimer, Lexitas videographer 23 24 ZOOM PARTICIPANTS: 25 Gabriella Alvarez, Lexitas 26 * * *</p>	Page 2	Page 4
<p>1 R. SRINIVASAN 2 THE VIDEOGRAPHER: We are now on 3 the record and the time is 9:05 a.m. 4 This is the video recorded deposition 5 of Rahul Srinivasan in the matter of 6 United States et al. versus Google 7 LLC. Today's date is Tuesday, August 8 the 29th, 2023. 9 My name is Lem Lattimer. The 10 court reporter is Rebecca 11 Schaumloffel. We are both in 12 association with Lexitas Legal. All 13 appearances are noted on the record. 14 Will the court reporter please 15 swear in the witness. 16 RAHUL SRINIVASAN, called as a witness, 17 having been first duly sworn by a Notary 18 Public of the States of New York, New 19 Jersey, and Pennsylvania was examined and 20 testified as follows: 21 EXAMINATION BY 22 MR. WOLIN: 23 Q. Good morning, Mr. Srinivasan. We 24 met off the record -- 25 A. Good morning.</p>	Page 3	Page 5

Page 10		Page 12	
1	R. SRINIVASAN	1	R. SRINIVASAN
2	Q. I want to focus on the time when	2	A. Likely, yes.
3	you were employed by Google.	3	Q. Did you take steps to preserve
4	During your time while you were	4	chats after receiving the instruction to
5	employed by Google, am I correct that your	5	preserve documents related to Google's
6	e-mail address was rahulsr@google.com?	6	digital advertising business?
7	A. That is correct.	7	MR. BITTON: Objection to form.
8	Q. Did you ever -- was that -- sorry.	8	A. Yes.
9	Was that your work e-mail address	9	Q. What steps did you take?
10	the entire time you worked at Google?	10	A. I would turn chat history on to
11	A. That is correct.	11	preserve the record of the chat.
12	Q. Did you ever use any other e-mail	12	Q. Could you tell me one way or the
13	addresses to conduct business during your	13	other whether for every chat that related to
14	time at Google?	14	Google's digital advertising business, you
15	A. No.	15	turned the history on?
16	Q. I want to just ask you this as a	16	MR. BITTON: Objection to form.
17	"yes" or "no" question.	17	A. After receiving the Notice or the
18	Prior to leaving Google, did you	18	guidance to preserve the record, I did turn
19	ever receive an instruction to preserve	19	on chat history for all relevant
20	documents related to Google's digital	20	communications.
21	advertising business?	21	Q. Mr. Srinivasan, let's step back.
22	A. Yes.	22	What is your educational
23	Q. When did you receive that?	23	background?
24	A. I do not recall the specific date.	24	A. I received a bachelors and masters
25	Q. Do you recall what year?	25	in computer science and an MBA.
Page 11		Page 13	
1	R. SRINIVASAN	1	R. SRINIVASAN
2	A. I do not. I believe it was either	2	Q. What year was your masters degree
3	2019 or 2020, but I'm not -- I'm not	3	in computer science?
4	completely sure.	4	A. 2011.
5	Q. Did you comply with that	5	Q. And where did you receive that
6	instruction?	6	degree?
7	MR. BITTON: Objection to form.	7	A. IIT in Bombay.
8	A. I did.	8	Q. What year did you receive your
9	Q. During the time you worked on	9	MBA?
10	Google's digital advertising products, did	10	A. 2016.
11	you use chats to communicate with your	11	Q. Where was that?
12	co-workers at Google?	12	A. At Harvard.
13	A. Yes.	13	Q. And did you work in between
14	Q. Have you ever used chats to	14	receiving your masters degree and starting at
15	communicate with co-workers about any aspect	15	Harvard?
16	of Google's digital advertising business?	16	A. I did.
17	A. I believe I may have, yes.	17	Q. Where did you work?
18	Q. And when do you recall using chats	18	A. I worked at BCG, Boston Consulting
19	to communicate with co-workers about Google's	19	Group, and at Blackstone.
20	digital advertising business?	20	Q. Did any of that work relate to
21	A. I do not recall specific	21	digital advertising?
22	instances.	22	A. No.
23	Q. Do you recall whether it was the	23	Q. After receiving your MBA, where
24	entire period you were employed at Google	24	did you go to work?
25	working on digital advertising?	25	A. Google.

